PLAINTIFFS' EXHIBIT 7

Chan Declaration

Redacted Version of Document Sought to be Sealed

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

PATRICK CALHOUN, et al., on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-05146-YGR-SVK

DECLARATION OF BRYANT CHAN

1.   I am an Engineering Director employed by Google LLC. I have been employed at Google since December 2018. I have been lead of the Ads Privacy Engineering Team since December 2018. In my capacity as the lead of the Ads Privacy Engineering Team, I am ultimately responsible for protecting user privacy as it relates to our Ads business as well as increasing user trust in Google by developing user ad controls. As part of my duties, I am familiar with Google's practices around encrypting data in Google's ads logs. I make this declaration based on personal knowledge and information provided to me by Google colleagues, and if called to testify, I could and would competently testify to such facts.

2.   I understand the Special Master has recommended that Google do a "full ongoing preservation" of the following fields (where they are present) from ██████████████████ ███████████████████████████), and preserve "all decryption keys [] that will allow any encrypted preservation data to be decrypted" for "[f]ull ongoing preservation of certain fields." Dkt. 666.

- sync state

- Incognito Bit(s)

- Any ID Not mentioned below

- IP v4 & v6

- ████████████

- query
- Referrer
- Useragent
- Biscotti – Encrypted UID
- Biscotti – UID
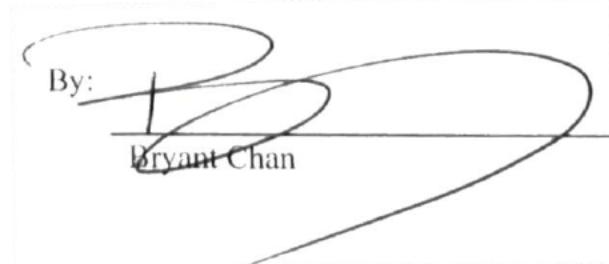- Rewritten Page URL
- ██████████
- ██████████
- Client Country

3.   I also understand that Plaintiffs have requested that "the Court slightly modify the language to mention 'rotating keys' for clarity." Dkt. 691 at 5.

4.   ███
███
████████████████████████████████████

5.   ███
███
█████████████████████████████████

6.   ███
████████████████████████████████████

7.   ███
██████████████████████████████

8.   ███
███
███
███████████████████████████████████

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CHAN DECLARATION

9.   Google fulfills its commitments to users regarding the control of their signed-in data by using the ███ ████████████████████████████████████ Preserving the ███████████████ (1) will make it more difficult for Google to keep its commitments to users and (2) will compromise the privacy protection that Google has implemented for users worldwide.

10.   To comply with the Special Master's recommendation that Google preserve "all decryption keys [] that will allow any encrypted preservation data to be decrypted" for "[f]ull ongoing preservation of certain fields," Google can undertake the following steps: ███████
███
███
███
████████████████

Executed on the 15th day of June 2022 at Mountain View, California.

By: _____
    Bryant Chan

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CHAN DECLARATION